

AFFIDAVIT

LOUIS PEREZ, being first duly sworn, states as follows:

1. I am presently incarcerated in F.C.I. Lewisburg, serving a life sentence. I was convicted on my guilty plea in the Eastern District of Pennsylvania of conspiracy to distribute heroin in case No. 91-00301-03.

2. The conspiracy to which I plead guilty involved at its head one Jesus Vargas Morales and a heroin distribution ring referred to as IFO or "Iron First."

3. I first joined the organization in 1990. Among my duties was accompanying Vargas to Queens, New York to make wholesale purchases of heroin for distribution in Philadelphia. I originally accompanied Vargas primarily as an interpreter, since he spoke very little English and his suppliers spoke no Spanish. When Vargas went to prison on a state conviction, I took over and began making trips to New York and taking deliveries on my own.

J.P. 4. There were two men who sold heroin to us in Queens in 1990. The one that we or I always met was known to me as ~~David~~ DAVID. He was in his mid-thirties, was quite tall, about 6'2" and had a dark or olive complexion. He appeared to be Indian or Pakistani. He spoke perfect English, however, without any foreign accent. He drove a light-blue Oldsmobile two-door, 1988 or 1989. He always delivered the heroin in a blue sports bag with grey stripes. Deliveries were made on the street or in parking lots, in Queens, in the general vicinity of LaGuardia airport. Frequently, we exchanged drugs for money in plain view of strangers.

J.P. 5. On one occasion, we met ~~David~~ DAVID in front of a hospital in Queens. He was with another man whom he introduced as ~~Mike~~ Michael Michael. Mike was also in his mid-thirties but was short, about 5'8" or

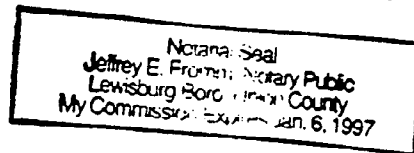
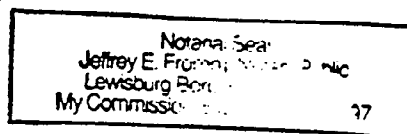
5'9" and weighed over 200 pounds. He had a pot belly and appeared to be Italian or Jewish. He had dark hair that was balding.

J.P. 6. In October, 1990, ~~Dave~~
DAVID told me he had 20 kilos of heroin in Pakistan and needed someone to go get it and bring it back. He said he needed two people over 50 to go as tourists. They would go by boat, the trip would take about 30 days, he would make all arrangements and would pay them \$50,000 for the trip. I said I would see if I knew somebody for the job. I never followed up on it because I feared a set up of some kind.

J.P. 7. I suspected that ~~Dave~~ and ~~Mike~~
DAVID MICHAEL were police when I was dealing with them. I am now pretty sure that they were law enforcement agents. They moved and acted like police (I am myself a former policeman) and were brazen and open in making deals, as if they had no fear of getting caught. I believe I can identify them if I see them.

David P. [Signature]

Subscribed and sworn to before me this 27 day of December 1995.



[Signature]